

COMMENT RESPONSE DOCUMENT

EASA PAD No.: 24-085

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Commenter 1: Deutsche Lufthansa AG – Ainara Ziarrusta Atutxa – 09/08/2024

Comment # 1

In regards of PAD 24-085 DLH Engineering has the following two comments:

(1) We understand the additional work only affects repaired holes that were inspected iaw 531153-02-1, 531153-02-2, 531155-02-1 and/or 531155-02-2 and in the Airbus approved instructions it was not specified the inspection to be adversely affected or no longer applicable in the repaired holes. For those cases, inspection needs to be performed within the deadlines defined in Para (1) (or 3months after AD Date) in accordance with the inspection SB.

However, being those holes already repaired (usually oversizing and/or bushing, coldworking), we believe that the instructions defined in the inspection SB are not applicable, as the SB is applicable for the unrepaired structure and we are dealing with repaired structure. In such a case, Airbus should need to be contacted within the Deadlines defined in Para (1) for further instructions on the inspection.

(2) Additionally, we would like to mention that we see a pattern that in older Airbus Approvals the statements about an ALI Task or Inspection SB being no longer applicable/ superseded were often not entered or were not complete (not only related to this inspection area, but in general in the past).

DLH has being reopening lots of TechRequests for different topics in the past in order Airbus to revise RDAS/ RDAF approval specifying this information. This may also be the case here, so we would like Airbus to perform a repair review on their side and correct the approvals without the need of reopening each TechRequest from our side (for the cases where the inspection should be superseded by the RDAF and Airbus did not enter the information within the approval on the first place)

EASA response:

Comment (1): As stated in the SB, if the instructions can not be accomplished, please contact Airbus for further instructions.



Comment (2): Comment noted. It was notified that according AD 2023-0212 it was possible to mis-interpret the need or not for additional inspection post repair. We agree that depending of the repair instructions, ISB may apply or not.

There are 3 categories of AIRBUS RDAF: A, B and C.

CAT A: statement of section 14 limitations of AIRBUS RDAF applies:

“These limitations are in compliance with EASA Part 21.A.443 for repair.

If not otherwise specified, limitations are from time of solution embodiment and all existing limitations are still applicable.”

For other categories, maintenance instructions post repair are always defined and detailed in the repair instructions document.

Therefore AD paragraph (2) has been updated accordingly by limiting the applicability to aeroplanes having embodies RDAF or previous RAS classified CAT A.

After review with Airbus it has been considered more adequate that the operators are checking the status of their aeroplanes with regards repairs.

